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JUL 28 3 28 PM '94

July 21, 1994

92-77

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed E. Hunt  
Federal Communications Commission  
1919 M Street, NW  
Washington, DC 20554

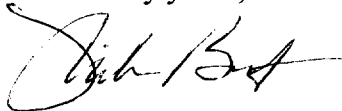
Dear Chairman Hunt:

As the Sheriff of Van Buren County, Arkansas, I am writing to you regarding the FCC proposal for Billed Party Preference. We are currently using an Inmate Phone Service which has been very helpful in managing our inmate facility, and we would not want to lose the benefits we receive from its services.

This service was most advantageous during a recent prisoner escape. Through the records maintained by AmeriTel, we were able to determine a potential destination, possible companions, and other related information. This helped result in the prisoner's capture within a brief time. I believe that the Billed Party Preference proposal will eliminate this and other valuable benefits we now obtain from our ability to select our phone provider..

I feel that this added information available for law enforcement contributes greatly to the safety of the general public. The current practice of billing the originating telephone for a call should not be changed in the case of calls from inmate facilities. Please give this proposal a vote to exempt inmate facilities from Billed Party Preference regulations.

Sincerely yours,



Mike Bridges  
Sheriff

zzb

cc: Senator Dale Bumpers  
Senator David Pryor

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0

"Cleveland County  
Grows Greater"



"Cleveland County  
Sheriff's Department"

P. O. BOX 1508 SHELBY, NORTH CAROLINA 28150

BUDDY R. McKINNEY  
SHERIFF

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'AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 27, 1994

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M. Street, NW  
Washington, D.C. 20554

Re: CC Docket No 92-77 Opposition to Billed Party Preference

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at inmate facilities.

We have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. The equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our staff to manage inmates.

Furthermore, we are sensitive to the rates inmates families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The

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proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we found to be necessary at our facility, ultimately reducing phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Max E. Blanton", with a stylized flourish at the end.

Max E. Blanton, Chief Jailer  
Cleveland County Jail  
100 Justice Place, Shelby, NC 28150

MEB/pbs



# GASTON COUNTY

SHERIFF'S DEPARTMENT

P. O. Box 1578 - Gastonia, North Carolina 28052 - Phone (704) 866-3160

LEROY RUSSELL  
Sheriff

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June 25, 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party Preference

Dear Honorable Hundt,

I am opposed to the application of Billed Party Preference (BPP) at inmate facilities.

I have analyzed the security and administration needs at our facility and have found it to be necessary to route inmate calls from our facility to a single carrier that is equipped to handle inmate calls and with whom I have a contractual relationship. I cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

I have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that I am under, I cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to inmate facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for my staff to manage inmates.

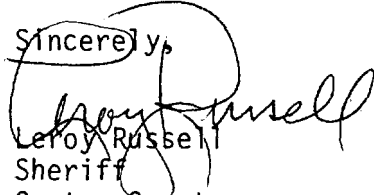
Furthermore, I am sensitive to the rates inmate families pay for calls. I fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. I do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed I believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

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Cont.  
Page 2

In short, BPP would take away our ability to employ important security and administrative measures that I have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. I urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our discretion and which we have a public responsibility to make.

Sincerely,



Leroy Russell  
Sheriff  
Gaston County  
Sheriff's Dept.

LR/krt

DOCKET FILE COPY ORIGINAL

May 31, 1994

*Policy (mark)*

Douglas S. Smith  
2312 Cassard Circle  
Gilbertsville, PA 19525  
(215) 646-7400 x2623

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AUG 12 1994

FCC - Common Carrier Bureau  
2025 M Street Northwest  
Washington, DC 20554

92-77

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

I am writing this letter in response to information presented in a newspaper article regarding "long distance access codes" and calling from pay telephones. The article, in the The Philadelphia Inquirer, stated that the FCC was proposing a new system that would protect consumers from inadvertently making a telephone call with one of those "unknown" long distance services that frequently charges 2 to 3 times as much as one of the big three carriers.

The article said the FCC was soliciting public opinion, so I am offering mine, as a user of the pay telephone system. I should mention that the article was not clear as to the plan offered by the FCC to replace the access code system currently used; it only mentioned that the new plan would require "a billion or so" dollars of new equipment.

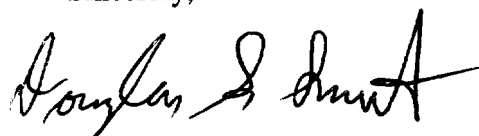
I frequently use the access code to contact my long distance carrier; mainly because I have been burned by one of the other "fly-by-night" carriers. I think the access code system works fine as long as the following rules are followed, and enforced by the FCC:

- 1) The pay phone must have a sign or notice that specifies what company will carry the calls
- 2) When the phone is used, there must be an audible description that identifies the carrier
- 3) The phone (and carrier) **MUST** allow access codes to be entered and acted upon
- 4) The procedure (pressing numbers) should be the same for every pay phone

Number 3) is very important because I have used phones where I was not able to enter the access code. I would get the message "It is not necessary to enter an access code". I was furious because I knew it wasn't *necessary* (if I didn't mind getting overcharged). Obviously the phone recognized what I was trying to do, it just wouldn't let me.

I think the access code system would work to the smart consumer's advantage as long as ground rules are set as outlined above, and enforced by stiff fines imposed to a violating carrier.

Sincerely,



Douglas S. Smith

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

07-06-94

RAMSEY COUNTY ADULT DETENTION CENTER  
14 WEST KELLOGG BLVD.  
SAINT PAUL MINNESOTA, 55102

TO WHOM IT MAY CONCERN,

PLEASE DO NOT VOTE FOR OR LOBBY FOR BILLED PARTY PREFERENCE; CC DOCKET NO.92-77.

WE ARE A PRETRIAL HOLDING FACILITY IN ST. PAUL MINNESOTA. THERE ARE ABOUT 220 INMATES HERE AT ANY GIVEN TIME. THEY HAVE ACCESS TO THE 22 TELEPHONES WE HAVE AVAILABLE TO THEM. THE 22 PHONES ARE PROVIDED TO US BY STAR PAYPHONES. THEY OFFER US NUMEROUS SERVICES PLUS A NICE COMMISSIONS CHECK EVERY MONTH. SINCE STAR OWNS AND OPERATES THE TELEPHONES AND PHONES LINES IT FREES UP OUR PERSONNEL FROM DOING REPAIRS. THE MONEY WE RECEIVE FROM THE COMMISSIONS MUST BE SPENT ON OR FOR THE INMATES. THIS INCLUDES ALL OF THE FOLLOWING; PAID COUNSELORS FOR CHEMICAL DEPENDENCY-DOMESTIC VIOLENCE-GED-LIFE MANAGEMENT, SELF HELP BOOKS, MAGAZINES, NEWSPAPER SUBSCRIPTIONS, CABLE TELEVISION SERVICE, EYE GLASSES, BUS TICKETS, BUS TOKENS, COMPUTER EQUIPMENT, RECREATION EQUIPMENT, HYGIENE SUPPLIES, MEDICAL EQUIPMENT, HAIR CUTS, PAPERBACK BOOKS, INTERPRETATION SERVICES, CLOTHING AND REPAIRS TO ANY OR ALL OF THE ABOVE. IF THE BPP IS PASSED MOST OF THE ABOVE BENEFITS TO THE INMATES WOULD BE LOST. PROVIDING THESE PERKS AND SERVICES HELPS US CONTROL OUR INMATE POPULATION. IT PROVIDES THEM WITH ACTIVITIES TO KEEP THE OCCUPIED INSTEAD OF DOING HARM TO THEMSELVES OR OTHERS.

ONCE AGAIN FOR OUR BENEFIT AND THE BENEFIT OF THE INMATES PLEASE DO NOT SUPPORT BILLED PARTY PREFERENCE; CC DOCKET NO.92-77.

SINCERELY,

*Rick Horeish*

RICK HOREISH  
DEPUTY SHERIFF, PROGRAM DIRECTOR

*Joyce Shockency*

JOYCE SHOCKENCY  
DEPUTY SHERIFF, PROGRAM DIRECTOR

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KB

ALVIN SHAW  
Chief Deputy

**TERRY KEEL**  
**TRAVIS COUNTY SHERIFF**  
P.O. Box 1748  
Austin, Texas 78767

**RECEIVED**

APRIL BACON  
Asst Chief - Law Enforcement  
DAN RICHARDS  
Asst Chief - Corrections  
ANDY SAENZ  
Chief of Staff

1010 Lavaca St  
Austin, TX 78701:

June 30, 1994

**AUG 12 1994**

Administration  
(512) 473-9770  
(fax 473-9722)

Central Records  
(512) 473-9749

Central Warrants  
(512) 473-9751  
(fax 473-9752)

Civil Process Div  
(512) 473-9771

Crime Investigations  
(512) 473-9728  
(fax 473-9774)

Crime Prevention  
(512) 473-9721

Fugitive Unit  
(512) 473-9769

Internal Affairs  
(512) 473-9718

Mental Health Unit  
(512) 473-9734

Personnel  
(512) 473-9772

Traffic Enforcement  
(512) 473-9721

Victim's Assistance  
(512) 473-9709

Patrol Services  
9301 Johnny Morris  
Austin, TX 78724  
(512) 473-9285

Central Booking  
715 E 8th St  
Austin, TX 78701  
(512) 480-5013  
(fax 480-5270)

Travis County Jail  
1000 San Antonio St  
Austin, TX 78701  
(512) 473-9021  
(fax 473-9237)

3614 Bill Price Rd  
Del Valle, TX 78617:

Correctional Complex  
(512) 473-4180  
(fax 473-4191)

Intermediate Sanctions  
(512) 473-4186  
(fax 247-2200)

Training Academy  
(512) 473-4194

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

Re: Billed Party Reference; CC Docket No. 92-77  
Telephone Calling

Dear Mr. Hundt:

I am writing to formally register our opposition to the proposed Billed Party Preference System. Our County resources, indeed as many other Counties throughout the United States, are seriously strained by the increasing costs of maintaining local Corrections Facilities. I see Billed Party Preference as an unnecessary impediment to the responsible and efficient management of the Corrections Institution. Billed Party Preference will indeed jeopardize maintenance of security, enhance the criminals ability to harass victims, as well as officials and facilitate telephone fraud within Corrections Facilities. Billed Party Preference will also have an adverse effect on staffing requirements with respect to telephone requirements within our facilities.

Please consider strongly our opposition to Billed Party Preference when engaged in rule making relevant to this subject.

Thank you for your consideration in this matter.

Sincerely,

Terry Keel, Sheriff  
Travis County Sheriff's Office  
P.O. Box 1748  
Austin, Texas 78767

TK:le

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KB

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AUG 12 1994

STATE OF NEW YORK  
DEPARTMENT OF LAW  
120 BROADWAY  
NEW YORK, N.Y. 10271

G. OLIVER KOPPELL  
ATTORNEY GENERAL

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

July 7, 1994

92-77

Honorable Reed E. Hundt  
Chairman  
Federal Communications Commission  
1919 M St., NW  
Washington, DC 20554

re: Bills for calls to area code 800 numbers

Dear Chairman Hundt:

Recently my office has received numerous complaints from consumers about bills for calls to area code "800" numbers. In most instances the consumers indicate that they have no idea why they are being billed. In all instances the consumers indicate that they believe that calls to "800" numbers are free to the calling party. Given the general use of "800" numbers this is a reasonable assumption.

I understand that last year the Federal Communications Commission approved regulations, specifically 47 CFR § 64.1504(c), that permit charges to the initiating party for calls to "800" numbers. My office opposed this provision, on the grounds that consumers believe that calls to "800" numbers are free and would be unaware of the possibility of charges for such calls. Events have now substantiated our concern that consumers would be misled if it is possible to be charged for a call to an "800" number.

I respectfully demand that the Commission revisit the issue of charges for calls to "800" numbers and consider whether it is in the public interest to return to a flat prohibition on charging consumers for calls to 800 numbers. I believe that this reform is necessary and should be made quickly to prevent further injury to consumers.

Thank you for your attention and consideration.

Very truly yours,

*G. Oliver Koppell*  
G. Oliver Koppell  
Attorney General

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GERRY, FRIEND & SAPRONOV

ATTORNEYS AT LAW

SUITE 1450

THREE RAVINIA DRIVE

ATLANTA, GEORGIA 30346-2131

(404) 399-9500

TELECOPIER (404) 395-0000

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AUG 3 11 08 AM '94

August 3, 1994

via FEDERAL EXPRESS

Ms. Peggy Reitzel  
Policy & Program Planning Division  
Common Carrier Bureau  
Federal Communications Commission  
1919 M Street, N.W., Room 544  
Washington, D.C. 20554

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AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Re: Billed Party Preference for 0+ InterLATA Calls  
CC Docket No. 92-77

Dear Ms. Reitzel:

Pursuant to our telephone conference of this date, enclosed are two (2) copies of the Comments of Interlink Telecommunications, Inc. which were filed with the Office of the Secretary on August 1, 1994.

We apologize for the oversight in sending you these copies sooner. Thank you for your courtesy and assistance in this matter. If you have any questions, please feel free to call.

Sincerely,



Charles A. Hudak

CAH/bw  
Enc.

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# Bell County, Texas

POST OFFICE BOX 768 / BELTON, TEXAS 76513 / TELEPHONE (817) 933-5105, EXTENSION 241

COUNTY JUDGE JOHN GARTH

June 27, 1994

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Billed Party Preference  
CC Docket No. 92-77

Dear Mr. Hundt,

Please accept this letter as notice of my opposition to the enactment of the currently proposed Billed Party Preference as it relates to correctional facilities.

I am sure that you have, and will, hear much technical language from those that understand this area of telecommunications. I will not attempt to delve into those matters.

My concern is the disruption of our current revenue sharing arrangements with our service provider. In the past, we had to dedicate hard dollars in the form of salaries and benefits to provide very minimal telephone service for inmates.

With our current arrangement, inmates have greatly expanded access to their families and others. In the cases of employed family and friends, this access is commensurate with their schedules and has greatly improved the morale of inmates, as well as their families. Please keep in mind that this access is important to those family members, whom I am elected to represent.

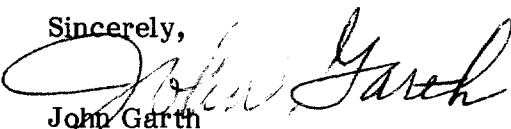
This system would otherwise be expensive and could not be provided by tax dollars. Our current arrangement costs us nothing, and actually returns a commission to us.

This commission is important as it defrays the costs of incarceration and allows us to fund rehabilitative programs that, again, would otherwise not be available.

In closing, this proposal would most likely cost Bell County several hundred thousand dollars alone. You must allow this process to remain a local decision for local benefit. I would urge you to drop this matter.

Sincerely,

No. of Copies rec'd \_\_\_\_\_  
List ABCDE \_\_\_\_\_

  
John Garth  
Bell County Judge

JG/pcd

505 North Mainman Road  
Georgetown, South Carolina  
29440

## County Of Georgetown

Keith J. McLean  
Detention Administrator  
(803) 546-3521

### Detention Center

DOCKET FILE COPY ORIGINAL

July 05, 1994

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AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Policy and Program Planning Division  
Common Carrier Bureau  
Room 544  
1919 M Street, N.W.  
Washington, D.C. 20554

Dear Sir or Madam:

Re: Billed Party preference; CC Docket No. 92-77

The Georgetown County Detention Center is presently under contract with a telephone provider and as the administrator of that facility I wish to go on record in opposition to the concept of Billed Party Preference. C.C. Docket #92-77.


We are a medium sized detention/correctional facility located on the coast of South Carolina. The bulk of the prisoner population are from the immediate area and this necessitates communication with family and legal advisors via telephone communications. Under the present system all prisoners are allowed unlimited telephone access to make contact with whomever they so chose. The only telephone numbers prisoners can not call to are the numbers of persons whom have requested that the particular number be blocked.

Should the Billed Party Preference regulation become law, I would be forced to assign a staff person to roam the facility a prescribable hour in order to insure access for the prisoner population to telephone communications. This would place an additional financial burden on this county, as an additional officer would require salary, training, uniforms benefits etc. It would also limit the prisoner access to telephone and could possibly interfere with the prisoners access to the courts.

While I am sure there may be abuses with the present system, this regulation would in effect punish this facility operation and more importantly punish the pre-trial detainees who have only been accused of a criminal act.

Please feel free to contact me on this or any other matter.

Sincerely,

  
Keith J. McLean

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HOWARD B. ALFRED  
SHERIFF, HENDERSON COUNTY  
ATHENS, TEXAS 75751  
July 8, 1994

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RE: CC Docket No. 92-77  
"Bill Party Preference" for  
O±InterLATA Calls

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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AUG 11 2 1994

Gentlemen:


FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

Bill Party Preference will undermine our ability to control inmate calling.

Bill Party Preference will eliminate current revenue-sharing arrangements that fund important inmate programs and may create new financial burdens for our facility.

Bill Party Preference is not the way to ensure reasonable rates for inmate calling.

The responsibility for ensuring that our provider charges reasonable rate lies with us, the facility administrators, who are in the best position to evaluate the circumstances at our particular facility. We object to adopting Bill Party Preference.

  
Howard B. Alfred  
Sheriff

HBA/ek

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Commissioners  
ALLAN G. MUELLER  
Chairman  
KENNETH McCLURE  
PATRICIA D. PERKINS  
DUNCAN E. KINCHELOE  
HAROLD CRUMPTON

## Missouri Public Service Commission

POST OFFICE BOX 360  
JEFFERSON CITY, MISSOURI 65102  
314 751-3234  
314 751-1847 (Fax Number)  
314 526-5695 (TT)

DAVID L. RAUCH  
Executive Secretary  
SAM GOLDAMMER  
Director, Utility Operations  
GORDON L. PERSINGER  
Director, Policy & Planning  
KENNETH J. RADEMAN  
Director, Utility Services  
DANIEL S. ROSS  
Director, Administration  
CECIL I. WRIGHT  
Chief Hearing Examiner  
ROBERT J. HACK  
General Counsel

July 6, 1994

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AUG 12 1994

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Room 222  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: CC Docket No. 92-77 - In the Matter of Billed Party Preference  
for 0+ InterLATA Calls

Dear Secretary:

Enclosed is an original and nine copies of **COMMENTS OF THE MISSOURI PUBLIC SERVICE COMMISSION** for filing in the above-referenced matter.

Please file stamp the extra copy for return to our office.  
Thank you for your attention to this matter.

Sincerely,

Colleen M. Dale  
Senior Counsel  
314-751-7431

CMD:ck

Enclosures

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EDWARD G. SWEENEY  
WARDEN

*Policy Division*

COUNTY OF LEHIGH  
DEPARTMENT OF CORRECTIONS  
LEHIGH COUNTY PRISON  
38 NORTH FOURTH STREET  
ALLENTOWN, PENNSYLVANIA 18102  
(215) 820-8188

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June 23, 1994

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AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed E. Hundt  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

RE: BILLED PARTY PREFERENCE; CC DOCKET NO. 92-77

Dear Mr. Chairman:

As a Warden of a county facility of approximately 750 inmates; I concur with the AJA's description that Billed Party Preference is a "prescription for disaster."

Our current automated phone system has allowed corrections staff to "get out of the phone business," while still maintaining an effective system of controls. Billed Party Preference would again require corrections personnel to take a hands-on approach to handle inmate telephone calls. Billed Party Preference will, for all intents and purposes, eliminate all fraud controls and computerized historical reports which have proven to be extremely helpful in various internal as well as criminal investigations.

Prisons are a very different community living environment, filled with individuals who are consistently looking for opportunities to take advantage of administrative controls as well as prey upon unknowing private citizens in the community. Putting the revenue generating issue aside, the controls which have been established by our current automated telephone system make management of a jail facility much more efficient and effective.

Sincerely,

Edward Sweeney, Warden

EGS:jmk

cc: The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness  
File

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DOCKET FILE

June 27, 1994

The Honorable Reed E. Hundt  
FEDERAL COMMUNICATIONS COMMISSION  
1919 M Street, N.W.  
Washington, DC 20054

*Policy Div*  
Fifteen East Peace Street  
Raleigh, NC 27604-1194  
Telephone 919 832-2881  
Facsimile 919 834-6755



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AUG 11 2 1994

Dear Mr. Hundt:

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

I wish to comment on Docket No. 92-77 before the FCC concerning Billed Party Preference (BPP). We strongly oppose adoption of BPP for the following reasons:

- BPP will cause a further decline in the quantity and quality of publicly available phone service. Four years ago, Peace College had several public pay telephones. Southern Bell has systematically removed a phone each year since. This year, we were informed that our revenues did not meet their requirements and they were removing our last phone. My only alternative was to pay Southern Bell about \$50/month and they would leave one phone on campus. They would receive all revenues (local and long distance) from the phone. Despite my pleas for assistance in this matter, Southern Bell was adamant in their position. Finally, I arranged for a private pay telephone company to install (at no cost to the College) a single telephone. However, because our College is small and revenues are limited, they receive all commissions and revenues for the unit. The adoption of BPP would, over a period of time, reduce this revenue stream to the private company and in turn, I would no longer have a public pay telephone. Every institution must have pay telephones available to the students, employees and general public. The adoption of BPP would contribute to unnecessary expense throughout higher education.

- We have a telephone modernization program underway for dormitory students that is funded in great part from commissions earned from a primary long-distance provider. The BPP option would undermine these arrangements and in the long run add to the expense of providing telephone service.

Thank you, in advance, for your consideration of our request.

Sincerely,

Dan J. Beakey  
Vice President for Business and Finance

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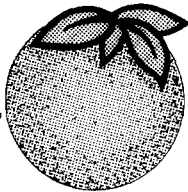
DJB:rb1

cc/ The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

JUL 12 3 30 PM '94



Orange



County

Policy Division

Telecommunications  
Sherry DeLand, Acting Manager  
109 East Church Street, Suite 230  
Reply To: Post Office Box 1393  
Orlando, Florida 32802-1393  
Telephone (407) 836-2800  
FAX (407) 836-2819

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June 20, 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed Hundt  
Chairman  
Federal Communications Commission  
1919 M Street N.W.  
Washington, D.C. 20554

RE: FCC BILLED PARTY PREFERENCE - CC DOCKET NO. 92-77

Dear Hon. Reed Hundt:

Commissions from our pay telephones are an important source of revenue enabling us to provide vital services to the people we serve. In Orange County, Florida, the pay telephones produce a tremendous revenue in our Corrections facilities to pay for services that might otherwise be supported by property taxes.

That is why we oppose "Billed Party Preference" and other efforts that would limit our freedom to manage this important asset and public service. The local government sector in this market has invested a great deal of time and effort to maximize this revenue. "BPP" creates a great injustice and is a direct attack on taxpayers' dollars.

Sincerely,

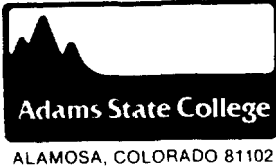
*Sherry DeLand*

Sherry DeLand

SD/lcd

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July 13, 1994

Mr. W. Caton  
Acting Secretary  
Federal Communications Commission  
1919 M Street NW  
Room 222  
Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

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92-77

Dear Mr. Caton:

I am writing you this letter in reference to Docket No. 92-77, Billed Party Preference. This proposed change would have a major effect on Adams State College. Currently we have an agreement with AT&T for 0+ calls placed from the campus.

These commissions have been used to provide additional telecommunication services to students, faculty, and staff. These include adding trunks for long distance dialing, public phones in academic buildings, fiber optic cable to increase capacity to buildings, etc. An emergency 911 system is currently being considered.

Because of Amendment 1 in Colorado, funds for these enhancements would not ordinarily be available. As you discuss this issue, please consider the significant impact it will have on educational institutions such as ourselves.

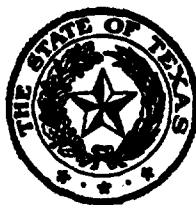
Sincerely,

*Howard Porter*

Howard Porter  
Director of Computing Services

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HOWARD B. ALFRED  
SHERIFF, HENDERSON COUNTY  
ATHENS, TEXAS 75751  
July 8, 1994

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: CC Docket No. 92-77  
"Bill Party Preference" for  
O±InterLATA Calls

Office of the Secretary  
Federal Communications Commission  
1919 M Street, N.W.  
Washington, D.C. 20554

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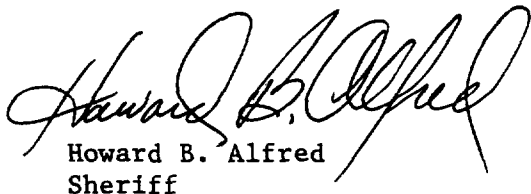
Gentlemen:

Bill Party Preference will undermine our ability to control inmate calling.

Bill Party Preference will eliminate current revenue-sharing arrangements that fund important inmate programs and may create new financial burdens for our facility.

Bill Party Preference is not the way to ensure reasonable rates for inmate calling.

The responsibility for ensuring that our provider charges reasonable rate lies with us, the facility administrators, who are in the best position to evaluate the circumstances at our particular facility. We object to adopting Bill Party Preference.

  
Howard B. Alfred  
Sheriff

HBA/ek

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## PACIFIC TELCOM

PAY TELEPHONE OWNERS AND OPERATORS

MEMBER

NORTH AMERICAN TELECOMMUNICATIONS ASSOCIATION

AMERICAN PUBLIC COMMUNICATIONS COUNCIL

CALIFORNIA PAYPHONE ASSOCIATION

NEVADA PAYPHONE ASSOCIATION

June 30, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communication Commission  
1919 M Street NW - Room 814  
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

RE: Billed Party Preference/CC Docket No. 92-77.

I must express our opposition to your agency's proposal to implement the costly Billed Party Preference (BPP). We own and operate pay telephones in California and Nevada and BPP will drastically alter our ability to continue to provide the public with quality telecommunication service.

All our phones are programmed to be in compliance with the Telephone Operator Consumer Services Improvement Act of 1990 (TOCSIA) to allow callers to access the carrier of their choice. BPP is clearly a redundant and unnecessary federal response to a problem that has already been effectively resolved.

BPP will impose new and unnecessary costs and inconvenience for consumers. Consumers will be faced with longer call set up times and will need to repeat billing information to two operators on some calls.


The commission must address the high risk for increased fraud that will occur with BPP. There are numerous local exchange carriers (LEC) that cannot afford to implement the enhanced screening features necessary to prevent fraud. Smaller long distance companies may also lack the ability to prevent the fraud that BPP will bring.

Competition and innovation will be eliminated by BPP. Prior to competition from independent payphones and operator service providers the LECs were the monopoly providers for communication needs. BPP will restore the LEC's bottleneck control over the initiation and routing of 0+ calls and enable them to further their own objectives at our expense.

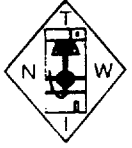
As any other business, we are concerned about the rates charged to consumers. If the Commission feels consumers need more protection it would seem that the better alternative to BPP would be to establish and enforce reasonable rate ceilings.

We respectfully ask the Commission to reject the BPP proposal. Thank you for your time and consideration.

Sincerely,  
PACIFIC TELCOM

  
W. M. Jarrett, Jr., President

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# TELCO NORTHWEST, INC.

15838 S.W. Upper Boones Ferry Rd. • Lake-Oswego, OR 97035 • (503) 620-3173

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June 30, 1994

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AUG 11 2 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

The Honorable Reed H. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW - Room 814  
Washington, DC 20554

RE: Billed Party Preference/CC Docket No. 92-77

Dear Chairman Hundt:

I am writing this letter to your agency to register our opposition to Billed Party Preference (BPP.)

Our Company operates approximately 1000 coin operated pay telephones in five states. BPP would make it very difficult to continue providing good service to the consumer.

We now allow callers to access the carriers of their choice. BPP, in our opinion, is an unnecessary response to a problem that has been resolved.

We respectfully ask the commission to reject the Billed Party Preference proposal.

Sincerely,

TELCO WEST, INC.

EVERT G. BROWN

EGB/ms

cc's The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

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# Office of the Warden



ROBERT H. EGOLF  
WARDEN

EARL F. REITZ  
DEPUTY WARDEN - SECURITY

HERBERT K. MOTTER  
DEPUTY WARDEN - TREATMENT

JANET M. KREIDER-SCOTT  
DEPUTY WARDEN - OPERATIONS

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY  
TELEPHONE  
AREA CODE 717-249-1620  
FAX 717-245-8792

CUMBERLAND COUNTY PRISON

1101 CLAREMONT ROAD  
CARLISLE, PA 17013

DOCKET FILE COPY ORIGINAL

July 26, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street NW

WASHINGTON, D. C. 20554

RE.: CC DOCKET NO. 92-77 OPPOSITION TO BILLED PARTY PREFERENCE

Dear Chairman Hundt:

We are opposed to the application of Billed Party Preference (BPP) at Inmate Facilities.

We have analyzed the security and administration needs at our Facility and have found it to be necessary to route inmate calls from our Facility to a single carrier that is equipped to handle inmate calls and with whom we have a contractual relationship. We cannot allow inmates to have open access to the telecommunications network and the freedom to use any carrier they please. BPP will take away our right to coordinate inmate calls through a carrier we know and trust. Instead, inmate calls will be routed to a number of different carriers, none of whom will have any obligation to us, and few that will be trained to handle inmate calls.

We have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network. Given the constant budgetary constraints that we are under, we cannot afford to provide this equipment without the help of inmate phone service providers. BPP would also eliminate the revenue stream that finances our inmate phones. If BPP is applied to Inmate Facilities, there will be no way for us to finance these phones, nor will there be inmate phone service providers to assist us. Without inmate phones, the morale of our inmates will be devastated. The resulting increase in tension will make it more difficult for our Staff to manage inmates.

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Furthermore, we are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Facility Administrators do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Facility Administrators enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Facility Administrators are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our Facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our Staff. We urge you to not adopt regulations that interfere with our administrative and security decisions -- decisions that are clearly within our direction and which we have a public responsibility to make.

Respectfully Submitted,

  
ROBERT H. EGOLF, WARDEN  
Cumberland County Prison  
1101 Claremont Road  
CARLISLE, PA 17913

RHE/st

cc: The Honorable James H. Quello  
The Honorable Andrew C. Barrett  
The Honorable Rachelle B. Chong  
The Honorable Susan Ness

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AUG 12 1994

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF THE SECRETARY

OFFICE PHONES:  
(405) 257-5445  
(405) 257-6234  
(405) 257-6235  
FAX (405) 257-5509

# CHARLES SISCO

SHERIFF

SEMINOLE COUNTY, OKLAHOMA



WEWOKA, OKLAHOMA

74884

DOCKET FILE COPY ORIGINAL

July 25, 1994

The Honorable Reed E. Hundt, Chairman  
Federal Communications Commission  
1919 M Street, NW  
Washington, D. C. 20554

Re: CC Docket No. 92-77 Opposition to Billed Party  
Preference

Dear Chairman Hundt:

I oppose the application of Billed Party Preference (BPP) at inmate facilities.

I have analyzed the security and administration needs at my facility and I have found it necessary to route inmate calls from my facility to a single carrier that is equipped to handle inmate calls and with whom I have a contractual relationship. Inmates should not be allowed open access to the telecommunications network and the freedom to use any carrier they please. I have also found it necessary to install phone equipment that is specifically designed for inmate calls. This equipment helps prevent fraud, abusive calls, and other criminal activity over the telephone network.

The sheriff's of rural Oklahoma cannot afford to provide this type of equipment without the help of inmate phone service providers. BPP will take away my right to coordinate inmate calls through a carrier I know and trust. Instead, inmates calls will be routed to a number of different carriers that will not provide the needed type of equipment to run a secure type system.

BPP would also eliminate the much need larger percent of revenue now paid to an individual correctional facility by a contracted individual carrier. That if calls are allowed to be routed to a number of different carriers, none of which will have any obligation to us, these larger percentages of revenue to correctional facilities will be terminated. The carriers profits will increase and the quality of service

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to the correctional facility and inmates will decrease and the rates charged by the carrier will remain the same. Without inmate phones, the moral of our inmates will be devastated and the increased tension will make it more difficult for our staff "one man per shift" to manage these inmates.

The sheriff's in Oklahoma are sensitive to the rates inmate families pay for calls. We fully appreciate the FCC's concern if some Sheriffs do not take responsibility for protecting inmate families from abusive rates. We do not agree with the FCC that the solution for this lack of responsibility is BPP. The proper and more effective action would be to adopt rate ceilings on inmate calls and then let Sheriffs enforce these rate ceilings through their contracts. Indeed we believe the overwhelming majority of Sheriffs are committed to requiring rates that are fair and reasonable.

In short, BPP would take away our ability to employ important security and administrative measures that we have found to be necessary at our facility, ultimately reducing inmate phone availability, which in turn decreases the efficiency of our staff. We urge you to not adopt regulations that interfere with our administrative and security decisions - decisions that are clearly within our discretion and which we have a public responsibility to make.

Respectfully submitted,

A handwritten signature in cursive script, reading "Charles Sisco".

Charles Sisco, Sheriff  
Seminole County Sheriff Department  
110 S. Wewoka Ave.  
Wewoka, Okla. 74884